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November 1, 2024

VIA PACER

The Honorable Vernon S. Broderick
United States Courthouse
Foley Square New York, NY 10007

Re: SEC v. Thurlow, et al., 1:21-cv-07700-VSB (S.D.N.Y.)

Request for an Extension to File Response to Motion to Strike

Dear Judge Broderick:

I am the attorney of record for Defendant Simon Thurlow and Defendant Richard Oravec, and I am writing this letter on behalf of these Defendants to request an extension of time to respond to Plaintiff's Motion to Strike.

On or about October 17, 2024, the Plaintiff filed its Motion to Strike certain defenses put forth by the Defendants. Defendant's response to the Motion was due on or about October 31, 2024. Unfortunately, after my mother-in-law recently passed away, my father-in-law became ill and on October 21st my wife and I were forced to drive to Connecticut due to the urgency, which is a 2 day drive each way. I did not return to Atlanta/my office until late night on October 30, 2024, and due to this emergency, I was unable to file a timely response. I spoke with Abby Rosen, the attorney for the Plaintiff SEC, and she has agreed to grant me a two-week extension, and consents to this letter request for the extension being filed today, until November 14, 2024 (Emails corroborating the Plaintiff's consent to my request are attached hereto).

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Therefore, I respectfully request that this Honorable Court grant undersigned counsel's request for the two week extension (until November 14, 2024) consented to by the Plaintiff, and issue an order reflecting the Court's grant of the requested extension.

Thank you, your Honor, for your consideration of this Request.

Respectfully submitted,

/s/ *Joseph A. Siciliano, Jr.*

Joseph A. Siciliano, Jr.
Attorney for Defendants
Thurlow and Oravec

From: Rosen, Abigail <RosenAb@SEC.GOV>
Sent: Thursday, October 31, 2024 12:30 PM
To: joe siciliano <joesicilianolaw@msn.com>
Cc: Rosen, Elizabeth <RosenEl@sec.gov>; Suthammanont, Victor <suthammanontv@SEC.GOV>; Primoff, Richard <PrimoffR@sec.gov>
Subject: RE: SEC v. Thurlow: Judge Netburn's Recent Order

Joe,

We consent to a 2-week extension for your response (so your opposition will be due November 14). Depending on what you file, I may request additional time for our reply because I have depositions on November 21 and 22. If there's anything else we need to discuss, give me a call.

Abby

Abigail Rosen [*she/her/hers*]

Trial Counsel

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**U.S. Securities and
Exchange Commission**

Rosen, Abigail<RosenAb@SEC.GOV>

To:You

Thu 10/31/2024 1:41 PM

That's fine. You can put in the letter that we consent to the extension and the late filing of the letter under the circumstances.